

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA**

JANE DOE,  
Plaintiff,

Case No. 4:21-cv-3049

Hon. John M. Gerrard

v.

Jury Demanded

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN  
and JOHN ROE, individually and in  
their official capacities; and OTHER  
UNIDENTIFIED DEFENDANTS;  
Defendants.

**PLAINTIFFS' EXPERT WITNESS LIST**

Plaintiff Jane Doe, by and through her attorneys Temperance Legal Group, PLLC, and Elizabeth Abdnour Law, PLLC, hereby submits her expert witness list pursuant to Fed. R. Civ. P. 26(a)(2)(A).

1. Lin-Chi Wang, JD  
Wang Law, LLC  
Allentown, Pennsylvania  
(484) 340-6269

Ms. Wang's testimony may include, without limitation, proper Title IX procedures required of federal funding recipients and whether UNL complied with those procedures with respect to Plaintiff's reports of Title IX violations.

2. Andrew Verzilli, MBA  
Verzilli Consulting Group, Inc.  
411 North Broad Street  
Lansdale, Pennsylvania 19446  
(215) 368-7797

Mr. Verzilli's testimony may include, without limitation, economic analysis quantifying Plaintiff's lost earning capacity.

3. Frank Ochberg, MD  
4211 Okemos Road, Suite 6

Okemos, Michigan 48864  
(517) 349-6333

Dr. Ochberg's testimony may include, without limitation, the neurological and psychological effects of institutional trauma and betrayal on an individual.

4. Any necessary rebuttal witnesses.

Expert witness reports have been prepared and are being shared with counsel for Defendants today pursuant to the February 2, 2022, Case Progression Order. Experts' *curricula vitae* are being included as attachments to this filing pursuant to Neb. Civ. R. 16.2(a)(2)(E).

Plaintiff reserves the right to supplement this list as information about her claims and/or Defendants' defenses becomes known throughout the course of investigation and discovery.

Date: September 20, 2022

Respectfully submitted,

**s/Elizabeth K. Abdnour**

Elizabeth K. Abdnour  
Elizabeth Abdnour Law, PLLC  
1100 W. Saginaw Street, Suite 4A-2  
Lansing, Michigan 48915  
P: (517) 292-0067  
F: (517) 709-7700  
elizabeth@abdnour.com

Karen Truskowski  
Temperance Legal Group, PLLC  
503 Mall Court #131  
Lansing, Michigan 48912  
P: (844) 534-2560  
F: (800) 531-6527  
karen@temperancelegallgroup.com

*Attorneys for Plaintiffs*

**PROOF OF SERVICE**

I hereby certify that on September 19, 2022, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

**s/ Elizabeth K. Abdnour**  
ELIZABETH ABDNOUR LAW, PLLC  
Attorney for Plaintiffs

**LIN-CHI WANG**

linchi@wanglawllc.com • 484-340-6269

**PROFESSIONAL EXPERIENCE**

**WANG LAW, LLC**, Allentown, PA, October 2021 - present

***Founder and Attorney***

- Nationwide solo civil rights law practice focused on Title IX, Title VI, Title VII, and anti-discrimination compliance, policy and practice, consulting, training, investigations, and adjudications for schools and workplaces.
- Represent individuals who are involved in a school or workplace investigation.
- Confidential counseling for leaders and managers on complex decision-making related to anti-discrimination, sexual harassment, Title VI, Title VII, and/or Title IX matters.
- Approved sexual misconduct investigator for United Educators (UE)
- Speaking engagements:
  - Title IX Investigative Report Writing (October 2021)
  - Title IX Emergency Removal in the K-12 Environment (March 2022)
  - Demystifying the Title IX Process (March 2022)

**MUHLENBERG COLLEGE**, Allentown, PA, June 2018 – August 2021

***Director of Equity & Title IX Coordinator, and Associate Dean of Students***

- Led the Equity & Title IX office at the college in service of all faculty, staff, and students.
- Implemented and oversaw all efforts at the institution related to civil rights and equal opportunity compliance, including Title IX, working closely with the Vice President of Student Affairs, Provost, and Vice President of Human Resources.
- Enforced the institution's nondiscrimination policy in responding to reports and coordinating resolution processes of possible policy violations.
- Served as primary investigator and conducted prompt, unbiased, and equitable investigations of formal complaints made under the policy.
- Presented trainings and led education and awareness efforts related to protected category discrimination, sexual misconduct, intimate partner violence, and stalking for students, faculty, staff, and athletics.
- Co-coordinated Clery compliance with Director of Campus Safety/Chief of Police.
- Co-coordinated the bias education and response team with the Associate Provost of Faculty Diversity Initiatives.
- Assisted with crisis response as part of College's leadership team.
- Oversaw sexual and gender violence prevention efforts and supervised the Assistant Director of Prevention Education for sexual and gender violence.
- Drafted and facilitated approval process of the College's anti-discrimination policies and processes, including Title IX, in 2018-19.
- Professional trainings received:
  - ATIXA Civil Rights Investigator Training (2018)
  - National Association of College and University Attorneys Annual Conference (2018)
  - NACUA Title IX Coordinator Training (2019)
  - Cozen O'Connor Title IX Coordinator, Investigator, and Decision-Maker training (2020)
  - Clery Center: Clery Act Training Seminar (2020)
  - USD Center for Restorative Justice: Restorative Justice for Campus Sexual Harm Intensive Facilitator Training (2021)

**MICHIGAN STATE UNIVERSITY**, East Lansing, MI, March 2016 – June 2018

***Title IX & Equity Investigator***

- Conducted investigations and made findings of claims of sexual misconduct, relationship violence, stalking, sexual exploitation, discrimination or harassment based on a protected category, and retaliation involving students, faculty, staff, and third parties pursuant to the University's Relationship Violence and Sexual Misconduct and Anti-Discrimination policies.
- Developed and conducted trainings that enhanced equity, diversity, and inclusion efforts at the university and promoted better understanding of prohibited discrimination and harassment for students, faculty, administration, and employees at the university.
- Provided advice and expertise to the campus community on university policies governing civil rights, education, privacy, employment, and labor law.
- Worked collaboratively with campus partners in the Office of General Counsel, human resources, student conduct, campus police, Office of International Students and Scholars, Resource Center for Persons with Disabilities, university housing, and counseling and advocacy services to address incidents and discuss preventative programming.
- Professional trainings received:
  - Clery Act compliance (2016)
  - American Association for Access, Equity and Diversity Annual Conference (2016)
  - Sexual assault trauma-informed interviewing with Tom Tremblay (2017)
  - Neurobiology of sexual assault trauma with Dr. Rebecca Campbell (2017)
  - American Bar Association Labor and Employment Law Annual Conference (2018)

**WHITE SCHNEIDER, PC**, Okemos, MI, March 2014 – March 2016

***Associate Attorney***

- Represented clients in civil and criminal proceedings, primarily focused on labor and employment law, at administrative hearings, arbitrations, District Courts, Circuit Courts, the Michigan Court of Claims, and the Michigan Court of Appeals. Wrote memos, motions, briefs, and orally argued issues under Title VI, Title VII, ADA, and state discrimination laws; the Family Medical Leave Act; Freedom of Information Act; the National Labor Relations Act; and the following Michigan laws: Teachers' Tenure Act; the Public Employment Relations Act; the Revised School Code sections 1248 & 1249; Employment Security Act; Administrative Code.

**THE HONORABLE JUDGE CHARLES FILICE**, Lansing, MI, February 2013 – March 2014 *Judicial Law Clerk*

- Provided support to the Judge through serving as liaison between the Judge, attorneys, parties, law enforcement, and departments within the court; ensured an efficient flow of cases by effectively communicating with lawyers, court staff, members of agencies and the public and by thoroughly understanding all civil and criminal proceedings.
- Mediated in pro per landlord-tenant cases.

**LEGAL SERVICES OF EASTERN MICHIGAN**, Flint, MI, October – December 2012

***Advocate***

- Researched, drafted memos, and provided legal advice to indigent clients on a range of legal issues, including domestic relations, landlord-tenant, consumer, public benefits, and creditor-debtor laws.

**MICHIGAN STATE UNIVERSITY, COLLEGE OF LAW, LEGAL CLINIC**, East Lansing, MI, August 2011-May 2012

***Small Business & Non-Profit Student Clinician Attorney***

**LICENSURE**

- State Bar of Michigan, Active member (P77014)
- Pennsylvania Bar Association, Active member (293001)

**EDUCATION**

**MICHIGAN STATE UNIVERSITY COLLEGE OF LAW**, May 2012, Juris Doctor, *cum laude*, East Lansing, MI

**UNIVERSITY OF FLORIDA**, December 2006, Master of Music, Gainesville, FL

**UNIVERSITY OF MICHIGAN**, May 2004, Bachelor of Music, University Honors, Ann Arbor, MI

**ANDREW C. VERZILLI, M.B.A**  
**CURRICULUM VITAE**

411 North Broad Street  
Lansdale, PA 19446

Office: (215) 368-7797  
Email: andrew.verzilli@gmail.com

**Education**

- |               |  |
|---------------|--|
| December 1991 | <b>Master's Degree in Business Administration</b><br>La Salle University, Philadelphia, PA<br>Major: Finance   |
| June 1988     | <b>Bachelor of Science Degree in Business Administration</b><br>Drexel University, Philadelphia, PA<br>Majors: Economics & Management of Information Systems |

**Experience**

**Verzilli Consulting Group, Inc./ Verzilli & Verzilli and Consultants, Inc. (Andrew G. Verzilli, Ph.D. & Associates : June 1988 to Present)**  
**Principal & Economist (June 1994 to Present)**

- Provide economic and financial analysis in the preparation of reports for litigation in various jurisdictions involving:
  - Earning Capacity Estimates
  - Business Valuations
  - Statistical Analysis
  - Pension Valuations
  - Structured Settlement Valuations
  - Medical Care Costs
- Provide economic and financial analysis for small businesses and municipalities
- Provide Analysis of Collective Bargaining Agreements for Townships and Police Organizations
- Expert testimony has been provided in State and Federal courts, including the following jurisdictions:
  - Federal District Courts:
    - Eastern/Middle District of PA, District of NJ, Eastern/Southern District of NY, West Palm Beach FL, Orlando FL, Southern District of OH, Southern District of IN,

District of Maryland, District of Arizona, and Western District of NC.

- Various Commonwealth Courts in Pennsylvania:
  - Adams County, Allegheny County, Beaver County, Berks County, Bucks County, Cambria County, Carbon County, Centre County, Chester County, Dauphin County, Delaware County, Erie County, Fayette County, Franklin County, Kent County, Lackawanna County, Lancaster County, Lehigh County, Luzerne County, Lycoming County, Monroe County, Montgomery County, Northampton County, Northumberland County, Philadelphia County, Potter County, Susquehanna County, Washington County, Wyoming County, York County.
- Various Commonwealth Courts in New Jersey:
  - Atlantic County, Burlington County, Camden County, Gloucester County, Jersey City, Mercer County, Middlesex County, Monmouth County, Morris County.
- Other Commonwealth Courts:
  - City of Norfolk, VA; Fairfield County, CT; Kings County, NY; Linn County, IA; Monroe County, IA; Maricopa County, AZ; Montgomery County, MD; New Castle County, DE; New York County, NY; Norfolk, VA; Sussex County, DE.

## **Teaching**

### **Drexel University, Department of Economics Adjunct Instructor (January 1992 to April 1999)**

- Instructor in Principles of Macroeconomics and Principles of Microeconomics (Undergraduate Day & Evening College)
- Student course evaluations were consistently above the average for the Department of Economics
- Highest student course evaluations in Department of Economics for Fall Term, 1993

## **Other Experience**

### **Andrew G. Verzilli, Ph.D. & Associates (Philadelphia, PA) *Apprentice Economic Analyst Work Manager (co-op employment through Drexel University)***

- Provided assistance and support in the preparation of economic reports involving personal earning capacity estimates for litigation in various jurisdictions. Assisted in the valuation of structured settlements and pension plans
- Coordinated business operations

**General Services Administration (Philadelphia, PA)**

***Assistant System Manager***

***(co-op employment through Drexel University)***

- Maintained databases for the Federal Protection and Safety Division, and assisted in the development of computer training programs for division employees
- Assisted in the development of a networked computer system for GSA. Responsible for the maintenance of mini-computer system and applications

**Research & Presentations**

“Jimmynomics, Reaganomics, Georgienomics: What’s Next?” (with Verzilli, A.G.; Swift, T.; Donato, C; et al.) - Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1991. Published in PEA Annual Proceedings, 1991.

“Real Interest Rates and Economic Growth: An Historical Perspective” - Paper presented at the Pennsylvania Economic Association Annual Conference, June, 1992. Published in PEA Annual Proceedings, 1992.

“Agenda for Economic Growth” (with Verzilli, A.G.; Swift, T.; Donato, C.; Collons, K; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, June, 1992. Published in PEA Annual Proceedings, 1992.

“The Effect of Tax Policy and Productivity” (with Verzilli, A.G.; Swift, T.; Donato, C; Collons, K; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, June, 1992. Published in PEA Annual Proceedings, 1992.

“Estimating Earning Capacity and Other Valuation issues – Why Use an Economist” Presentation with Verzilli, A.G.; Post & Schell Seminar, April 16, 1993 (Philadelphia, PA).

“Social Security: Who Will Pay (2000 and beyond)?” - Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1993. Published in PEA Annual Proceedings, 1993.

“Our Past Presidents Wonder: Is Clintonomics the Light at The End of the Tunnel?” (with Verzilli, A.G.; Beachel, J.; Swift, T; Collons, K; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1993. Published in PEA Annual Proceedings, 1993.

“The Economist Can Not Estimate the Value of Hedonic Damages” - Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1994. Published in PEA Annual Proceedings, 1994.

“Clintonomics – Good Morning? – Good Night? – or Good Bye” (with Verzilli, A.G.; Collons, K; Donato, C; Swift, T; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1994. Published in PEA Annual Proceedings, 1994.

“Executive Compensation & Productivity – Are Executives Worth Their Salaries?” (with C. Won-Martinez) Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1994. Published in PEA Annual Proceedings, 1994.

“The Impact of Corporate Downsizing in The Northeast” (with C. Wong-Martinez) Presented at the PEA Conference, June, 1995.

“The Economics of Railroad Retirement Pensions” (with C. Donato) Presented at the PEA Conference, June, 1995.

“The Impact of Slander on the Profitability of a Firm” - Presented at the PEA Conference, June, 1996.

“Examining Medical & Non-Medical Experts in Civil Litigation” - Presented at the Lancaster County Bar Association, June 2001. Published in The Pennsylvania Bar Institute, 2001.

“Economic Issues in Pennsylvania Courts” - Presentation at the Lancaster County Bar Association, May, 2005.

“Economics in Civil Litigation” - Presented at the Bucks County Bar Association Monthly Civil Litigation Meeting, March, 2009.

“Presenting and Defending Catastrophic Injury Claims” (Presentation at the Pennsylvania Bar Institute: CLE, October, 2011. Published in The Pennsylvania Bar Institute, PBI No. 2011-6943.

“How Juries View Tractor Trailer Accidents” - Presented at the Pennsylvania Bar Institute: CLE, August, 2012. Published in The Pennsylvania Bar Institute, PBI No. 2012-7353.

Presenting as an Economic Expert at the Committee for Justice for All: CLE Seminar (April, 2017).

“Litigating the Traumatic Brain Injury Case” - Presented at the Pennsylvania Bar Institute: CLE, March, 2019. Published in The Pennsylvania Bar Institute, PBI No. 2019-10689.

Guest Lecturer at Temple University, Beasley School of Law. (Advanced Trial Advocacy, September 2015-present)

### **Association Membership & Non-Profit Organizations**

National Association of Forensic Economics  
American Economic Association

Lansdale Little League	President (August, 2004 to August, 2007)
Cannoneers Baseball:	Trustee (2007-2011)
Lansdale Catholic High School	Asst. Varsity Baseball Coach (2009-2010)

### **Awards**

General Services Administration Outstanding Performance (college)  
General Services Administration Certificate of Achievement (college)

**Frank M. Ochberg, M.D.**

Clinical Professor of Psychiatry, Michigan State University  
 Formerly -  
 Associate Director, National Institute of Mental Health  
 Director, Michigan Department of Mental Health  
 Adjunct Professor of Criminal Justice, Michigan State University  
 Adjunct Professor of Journalism, Michigan State University  
 Examiner, American Board of Psychiatry

**OFFICE:**

Michigan Office: 4383 Maumee Drive, Okemos, Michigan, 48864  
 Florida Office: 97652 Overseas Hwy, HH-1, Key Largo, FL 33037  
 Phone: 517-775-8320 email: ochberg@earthlink.net

**EDUCATION:**

Harvard University	A.B. cum laude	1957 - 1961
Johns Hopkins University	M.D.	1961 - 1965
USPHS Hospital SF Cal	Internship in Medicine & Surgery	1965 - 1966
Stanford University	Residency in Psychiatry	1966 - 1969
University of London	Fellowship Forensic Psychiatry	1976 - 1977

**EMPLOYMENT:**

National Institute of Mental Health		
Regional Director; Division Director; Assoc. Director		1969 - 1979
Michigan Department of Mental Health		
Director (Cabinet Position)		1979 - 1981
Sisters of Mercy Health Corporation: St. Lawrence Hospital		
Medical Director for Mental Health		1981 - 1984
Founder and Director, Victimization Program		1981 - 1984
Private Practice of Psychiatry		1981 -

**MEDICAL LICENSES:**

Michigan (active)  
 California, Maryland, Washington DC (inactive)

**MILITARY:**

United States Public Health Service	Active Duty	1965 - 1981
	Reserve	1981 - 1986

**BOOKS EDITED:**

Violence and the Struggle for Existence (with Daniels and Gilula), Little Brown and Company	1970
Victims of Terrorism (with Soskis), Westview	1982
Posttraumatic Therapy and Victims of Violence, Brunner/Mazel	1988

**SCIENTIFIC AND LAY PUBLICATIONS:**

Over 100 titles dealing with human time judgment (1963 - 1969), aggression, conflict and conflict resolution (1968 - ), community mental health (1970 - 1983), public policy (1973 - ), terrorism and hostage negotiations (1976 - ), victimization and traumatic stress, including "Stockholm Syndrome" (1982 - ), journalism and trauma (1994 - ).

## EDITORIAL BOARDS:

Brunner/Mazel Psychosocial Stress Series	1985
Journal of Family Psychotherapy	1986 - 1991
Journal of Traumatic Stress	1988 - 1992

LISTINGS: Who's Who in America  
Best Expert Witnesses in America

## CONSULTANTSHIPS, COMMITTEES, TASK FORCES, ORGANIZATIONS:

American Psychiatric Association		
Committee on Violence	Member	1969 - 1971
Task Force on Community Crisis	Chair	1971 - 1973
Council on National Affairs	Member, Chair	1973 - 1978
Committee on Women	Member	1978 - 1983
Task Force on Victimization	Chair	1983 - 1985
Committee to Revise PTSD	Member	1985 - 1988
Assn Research on Nervous & Mental Disease	Vice-President	1972
National Committee on Patients' Rights	Board Member	1975 - 1977
National Task Force on Disorders and Terrorism (US Dep't of Justice)	Member	1975 - 1977
Federal Bureau of Investigation	Consultant	1976 - 2020
London Metropolitan Police (Scotland Yard)	Consultant	1976 - 1977
National Security Council (counter-terrorism)	Liaison	1978 - 1979
U.S. Secret Service	Internal Advisor	1978
	Consultant	1979 - 2014
U.S. Air Force: Worldwide Briefing Mission on Terrorism and Hostage Negotiation		1978
Int'l Society for Traumatic Stress Studies	Board Member	1985 - 1986
	Member	1985 -
Michigan Victim Alliance	Med. Advisor	1986 - 2015
The Dart Foundation	Representative	1991 - 2014
Gift From Within (international PTSD nonprofit)	Founder	1993 -
Critical Incident Analysis Group	Founder	1993 - 2003
American Red Cross	Volunteer	1994 - 2009
National Center for PTSD	Advisor	1997 - 2006
Louis August Jonas Foundation	Board Member	1999 - 2004
FBI School Shooter Symposium	Expert	1999
Columbine High School	Consultant	1999 - 2002
Dart Center for Journalism and Trauma	Founder	2000 -
National Center for Victims of Crime	Board Member	2000 - 2016
Michigan Crime Victims Services Commission	Commissioner	2006 - 2011
Academy for Critical Incident Analysis	Founder	2007 -
International Dialogue Initiative	Member	2008 -
Honor For All	Medical Advisor	2010 -
Service Women's Action Network	Board Member	2012 - 2016
Trust for Trauma Journalism	Trustee	2017 -

## HONORS

Golden Award of the Academy of Traumatology	1998
Law Enforcement Medal of the Sons of the American Revolution	1999
Shafer Award: National Organization for Victims Assistance	2001
Senior Fulbright Scholar (South Africa)	2002
Lifetime Achievement Award: Int'l Soc. Traumatic Stress Studies	2003

January, 2021